

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

1199SEIU UNITED HEALTHCARE WORKERS EAST,

Petitioner,

v.

PSC COMMUNITY SERVICES, et al.,

Respondents.

**RESPONDENT PSC
COMMUNITY SERVICES'
ANSWER TO PETITION
TO CONFIRM
ARBITRATION AWARD**

Civil Action No.
1:20-cv-03611-JGK

Respondent PSC COMMUNITY SERVICES, (hereinafter referred to as "Respondent"), by and through its attorneys, for its Answer to the Petition of 1199SEIU United Healthcare Workers East ("Petitioner") to Confirm Arbitration Award (the "Petition") herein, exclusively for itself and not for any other Respondent, states as follows:

AS TO "NATURE OF ACTION"

1. Respondent admits that Petitioner seeks to proceed as set forth in Paragraph 1 of the Petition. To the extent Paragraph 1 refers to a document, Respondent respectfully refers the Court to such document which speaks for itself.

AS TO "PARTIES"

2. Respondent admits the allegations set forth in Paragraph 2 of the Petition, except denies knowledge or information sufficient to form a belief as to the number of homecare workers Petitioner represents in New York City and surrounding counties.

3. Respondent admits the allegations set forth in Paragraph 3 of the Petition.

AS TO "JURISDICTION AND VENUE"

4. Respondent admits the allegations set forth in Paragraph 4 of the Petition.

5. Respondent admits the allegations set forth in Paragraph 5 of the Petition.

AS TO "STATEMENT OF FACTS"

6. Respondent admits the allegations set forth in Paragraph 6 of the Petition.

7. Respondent admits the allegations set forth in Paragraph 7 of the Petition.

8. Respondent admits the allegations set forth in Paragraph 8 of the Petition.

9. Respondent admits the allegations set forth in Paragraph 9 of the Petition.

10. Respondent admits the allegations set forth in Paragraph 10 of the Petition, except states that it signed such Memorandum of Agreement with Petitioner in January 2016.

11. Respondent admits the allegations set forth in Paragraph 11 of the Petition.

12. Respondent admits the allegations set forth in Paragraph 12 of the Petition.

13. Respondent denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 13.

14. Respondent admits the allegations set forth in Paragraph 14 of the Petition.

15. Respondent denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 15 of the Petition.

16. Respondent admits the allegations set forth in Paragraph 16 of the Petition.

17. Respondent admits the allegations set forth in Paragraph 17 of the Petition.

18. Respondent admits the allegations set forth in Paragraph 18 of the Petition.

19. Respondent denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 19 of the Petition.

20. Respondent admits the allegations set forth in Paragraph 20 of the Petition as to itself.

21. Respondent admits the allegations set forth in Paragraph 21 of the Petition .

22. Respondent admits the allegations set forth in Paragraph 22 of the Petition as to itself.

23. Respondent admits the allegations set forth in Paragraph 23 of the Petition.

24. Respondent admits the allegations set forth in Paragraph 24 of the Petition.

25. Respondent denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 25 of the Petition.

Dated: June 9, 2020

BOND, SCHOENECK & KING, PLLC

By: s/Michael P. Collins
Michael P. Collins
Attorneys for Respondent PSC
COMMUNITY SERVICES
600 Third Avenue, 22nd Floor
New York, New York 10016-1915
Telephone: (646) 253-2318
mcollins@bsk.com